

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

STEVEN BENANAV, on behalf of himself  
and all others similarly situated,

Plaintiff,

vs.

HEALTHY PAWS PET INSURANCE LLC,

Defendant.

Civil Action No. 2:20-cv-00421-RSM

**STIPULATED MOTION TO STAY  
SCHEDULING ORDER**

NOTING DATE: April 20, 2020

Plaintiffs Steven Benanav, Bryan Gage, Monica Kowalski, Lindsay Purvey, Stephanie Caughlin, and Katherine Thomas (“Plaintiffs”) and Defendant Healthy Paws Pet Insurance LLC (“Defendant” or “Healthy Paws”) (collectively, the “Parties”) hereby jointly move the Court for an order staying the Court’s Scheduling Order.

**BACKGROUND FOR THE MOTION**

On July 23, 2020, the Parties filed a Joint Status Report where the Parties agreed that first-party discovery would be stayed pending resolution of Defendant’s Motion to Dismiss. Dkt. 33, at 3. The Joint Status Report contained a proposed scheduling order for class certification. *Id.* at 7. The current deadlines for class certification are as follows:

- April 20, 2021: Agreed deadline for fact discovery.
- May 20, 2021: Deadline for Plaintiffs to file motion for class certification.
- August 13, 2021: Opposition to Motion to Certify Class.

- September 10, 2021: Reply in Support of Motion to Certify Class.

Dkt. 34 (the “Scheduling Order”).

On December 23, 2020, Defendant filed a Motion to Dismiss Plaintiffs’ Second Amended Complaint and a Motion to Strike Plaintiffs’ Nationwide Class Allegations (Dkt. 49 and Dkt. 52) (the “Motions”). Plaintiffs filed an Opposition to the Motions on January 28, 2021. Dkt. 56. Defendant filed a Reply in Support of the Motions on February 17, 2021. Dkt. 57. The Court has yet to rule on Defendant’s Motions.

In light of Defendant’s pending Motions, the Parties believe it would be most efficient to stay the current Scheduling Order and submit a proposed modified scheduling order within seven days of the Court’s ruling on Defendant’s Motions.

WHEREFORE, the Parties respectfully request an Order staying the Scheduling Order and permit the parties to submit a proposed order modifying the Court’s Scheduling Order within seven days of the Court’s order on Defendant’s Motions.

DATED April 20, 2021.

/s/ Samuel J. Strauss

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IT IS SO ORDERED.

DATED this 20<sup>th</sup> day of April, 2021.



RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on April 20, 2021 I caused a true and correct copy of the foregoing to be filed in this Court's CM/ECF system, which sent notification of such filing to counsel of record.

DATED this April 20, 2021.

/s/ Samuel J. Strauss  
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